



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

VIA ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED

Robert Swenson, President
Global Titanium Inc.
d/b/a AmeriTi Manufacturing Company
19300 Filer Avenue
Detroit, Michigan 48234

Re: Notice of Violation
Global Titanium Inc. d/b/a AmeriTi Manufacturing
Detroit, Michigan

Dear Mr. Swenson:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Global Titanium Inc. d/b/a AmeriTi Manufacturing Company (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating your permit to install and the Michigan State Implementation Plan at your Detroit, Michigan facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Natalia Vazquez. You may call her at (312) 353-8314 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Enclosure for a small business, enclose the SBREFA fact sheet.

cc:
Jenine Camilleri, Enforcement Unit Supervisor, Air Quality Division,
Michigan Department of Environment Great Lakes and Energy (EGLE)
CamilleriJ@michigan.gov

IN THE MATTER OF:

Global Titanium Inc.
Detroit, Michigan

Proceedings Pursuant to
Section 113(a)(1) of the
Clean Air Act, 42 U.S.C.
§ 7413(a)(1)

NOTICE OF VIOLATION

EPA-5-20-MI-04

NOTICE OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). EPA finds that Global Titanium Inc. d/b/a AmeriTi Manufacturing Company (AmeriTi) is violating its permit to install and the Michigan State Implementation Plan (SIP), as follows:

Statutory and Regulatory Background

1. On May 6, 1980, EPA approved Michigan rule 201 (R336.1201) Permits to install as part of the federally enforceable SIP for Michigan. 45 Fed. Reg. 29790.
2. The SIP requires the facility to obtain a permit to install in order to install, construct, reconstruct, relocate, or alter any process, fuel-burning equipment, or control equipment that may be a source of an air contaminant.
3. On December 19, 2016, EPA approved R339.1911 Malfunction Abatement Plans to prevent, detect, and correct malfunctions or equipment failures resulting in emissions exceeding any applicable emission limitation as part of the federally enforceable SIP for Michigan. 81 Fed. Reg. 91839.
4. The SIP requires the facility to comply with the requirements of the approved Malfunction Abatement Plan.

Findings of Fact

5. Global Titanium Inc. d/b/a AmeriTi Manufacturing Company owns and operates a titanium metallurgical products manufacturing facility at 19300 Filer Avenue, Detroit, Michigan.
6. AmeriTi obtained permit to install No. 549-97A (PTI) on December 21, 2018.
7. AmeriTi's PTI includes requirements related to the two furnaces located in the melt shop, controlled by a baghouse (FGFURNACES).

8. Emissions from AmeriTi's melt shop are subject to the malfunction abatement plan regulations in the Michigan SIP at R339.1911, and the requirements of its PTI.
9. The SIP and PTI require the facility to submit for approval and implement an approved Malfunction Abatement Plan (MAP). *See* PTI, FGFURNACES Section III.
10. AmeriTi's PTI requires AmeriTi to develop and follow a MAP to prevent particulate matter emissions.
11. AmeriTi's MAP specifies procedures to be followed when the baghouse's pressure drop is above 6" of water gauge or below 2" of water gauge.
12. AmeriTi's MAP specifies that when the baghouse pressure drop is below 2" of water gauge, which is the minimum acceptable gauge reading, the operator must call the Maintenance Department to conduct, "Maintenance checks, as necessary, for improper operation of gauges, bag condition, excessive dust in the dust collector hopper, improper operation of dampers, improper operation of shaker cleaning system, damaged ductwork, high humidity in exhaust air. Determine what the problem is and repair it."
13. AmeriTi's MAP specifies, "All routine and special maintenance procedures along with the ongoing monitoring program are the direct responsibility of the Maintenance Manager and his Shift Maintenance Supervisors."
14. AmeriTi provided EPA copies of its baghouse inspections sheets, where it documents its internal practice of notifying its management only when the pressure drop is above 6" of water gauge.
15. AmeriTi has provided no evidence that its facility operator is notifying the Maintenance Department or its facility management when the baghouse's pressure drop is below 2" water gauge, as required by its MAP.
16. AmeriTi has provided no information to demonstrate the facility takes actions specified in the MAP to conduct maintenance checks to identify and repair problems when baghouse pressure drop is below 2" of water gauge.

Violations

17. AmeriTi has failed to comply with the SIP which requires it to comply with its PTI and the approved MAP.
18. AmeriTi has failed to comply with its PTI, specifically the requirements in its MAP to prevent particulate matter emissions.

Environmental Impact of Violations

19. AmeriTi's violations have caused or can cause excess emissions of particulate matter.

20. Particulate matter, especially fine particulates contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. Particulate matter exposure contributes to: irritation of the airways, coughing, and difficulty breathing; decreased lung function; aggravated asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease.

Date

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division